



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

September 19, 2022

By ECF

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED, last page.

Re: *United States v. Thomas Santos, et al.*, S1 20 Cr. 481 (ER)

Dear Judge Ramos:

The Government writes, with the consent of counsel for defendants Victor Del Valle, Erik Suarez, and Adrean Coombs, to respectfully request that the trial in this matter currently scheduled to begin on October 24, 2022, be adjourned to a date convenient for the Court in the second quarter of 2023.¹

An adjournment is necessary because two defendants, Coombs and Del Valle, were recently appointed new counsel who require additional time to review the discovery in this case; continue any discussions with the Government concerning pretrial resolutions; and, if necessary, to prepare for trial. After conferring with counsel for defendants Del Valle, Suarez, and Coombs, the Government further understands that counsel for the defendants are already scheduled to proceed to trial in other matters in the first quarter of 2023.

Accordingly, the Government respectfully requests that the trial currently scheduled to begin on October 24 (and all related pretrial deadlines) be adjourned to a date convenient for the Court in the second quarter of 2023. The Court previously excluded time under the Speedy Trial Act through October 24; in light of this adjournment request, as well as the reasons detailed above underlying the request, the Government further requests that the Court exclude time from October 24 through any new trial date.

¹ The remaining defendants charged in this case, Thomas Santos and Jeffrey Guzman, previously pled guilty before the Court.

The Government has conferred with George Goltzer, Sabrina Shroff, and Matthew Myers, counsel for defendants Del Valle, Suarez, and Coombs, respectively, who consent to the requested adjournment and the exclusion of time through the new trial date.

Respectfully submitted,

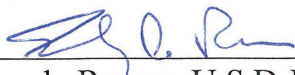
DAMIAN WILLIAMS
United States Attorney
Southern District of New York

By: /s/
Jarrod L. Schaeffer / Elizabeth A. Espinosa
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cc: Counsel of Record (via ECF)

The trial will commence on Monday, April 24, 2023, at 9:30 a.m. Motions in limine and proposed jury instructions, voir dire questions, and verdict sheets are due March 27, 2023. Oppositions thereto are due April 10, 2023. A final pretrial conference will be held on April 20, 2023 at 2:00 p.m. Speedy trial time is excluded from October 24, 2022 until April 24, 2023, in the interest of justice.

SO ORDERED.



Edgardo Ramos, U.S.D.J
Dated: 9/21/2022
New York, New York